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#### REMARKS

This Response is submitted in reply to the Office Action mailed February 11, 2004 ("the Action"). Claims 1-15 are pending in the application but stand rejected as being anticipated under §102 (b).

#### The Prior Art Rejection

The Action rejects all of the pending claims (Claims 1-15) as being anticipated by reference U.S. Patent No. 3,808,636 to Gouba ("Gouba"). Applicants respectfully disagree.

More particularly, the Action states that Gouba teaches a link-cutting machine "similar to the Applicant's claimed packing mechanism" with the "first end portion having a fork-like or curved shape." However, Gouba proposes a mechanism for cutting a chain of articles (such as sausages) using a sensing device 30 with an elongate arm 38 and a lower (horizontal) finger 36 which swing vertically so that the finger is able to "sense the presence of a link joining area on the sausage upstream of a cutting device 32" (col. 2, lines 20-25 and 36-40, Figures 3-6). Notably, the device proposed by Gouba compresses a portion of the sausage upstream of a cutting device 32 and fails to teach or suggest, inter alia, pushing adjacent segments of suspended elongate product closer together. Further, the arm 38 of Gouba appears to pivot or move (up and down) relative to a fixed longitudinal location and has a very limited longitudinal stroke.

In contrast, in some embodiments, the present invention is directed to a high-density packing member that moves repetitively with a generally longitudinal stroke to push adjacent segments of stuffed or elongate product closer together on a carrier member (typically a rod).

Claim 1 recites in part:

A packing mechanism for arranging suspended elongated product on a carrier member, comprising:

an elongated packing arm having an associated length and opposing first and second end portions, said first end portion comprising a contact member that has spaced apart first and second fingers, wherein, in operation, the contact member is adapted to periodically contact a portion

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of a suspended elongated item held on a carrier member to cause adjacent portions of the suspended elongated item to move closer together on the carrier member.

Clearly, Gouda fails to teach or suggest, *inter alia*, configuring the mechanism to move suspended portions or item(s) closer together on a carrier member. The dependent claims recite additional novel subject matter, such as a gap in the fingers that receive at least a portion of the carrier member (*see, e.g.*, Claims 16 and 18). Accordingly, Applicants respectfully request that this rejection be withdrawn.

#### New Claims

Claims 16-20 have been added to form a more complete claim set for the pending application and are supported by the specification. Entry, consideration and allowance of same is respectfully requested.

#### Claim Amendments

Certain of the original claims have been amended in a non-narrowing manner for clarity.

#### Information Disclosure Statement ("IDS")

Applicant notes that examiner-initialed copies of Forms PTO-1449 filed with applicant's Information Disclosure Statement (IDS) dated August 6, 2003 did not accompany the Action. A copy of this previously submitted IDS is attached for ease of reference. Applicant respectfully requests that the Examiner acknowledge consideration of the references cited therein.

In addition, out of an abundance of caution, Applicants submitted a supplemental IDS April 22, 2004. A returned initialed Form PTO 1449 indicating consideration of the references listed thereon is also respectfully requested.

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Conclusion

Applicants submit that the present application is in condition for allowance and the same is earnestly solicited. Should the Examiner have any matters outstanding of resolution, he is encouraged to telephone the undersigned at 919-854-1400 for expeditious handling.

Respectfully submitted,

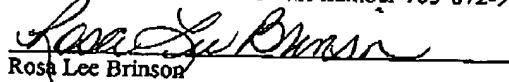


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UNDER 37 CFR 1.8**

I hereby certify that this correspondence is being facsimile transmitted to the Patent and Trademark Office via the central facsimile number 703-872-9306 on April 30, 2004.

  
Rosa Lee Brinson